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ATTORNEYS FOR THE DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

BUFFET PARTNERS, L.P., et al.

DEBTORS.¹

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CASE NO. 14-30699-11

CHAPTER 11

(Jointly Administered)

**Expedited Hearing on the Motion Requested
for April 29, 2014 at 2:00 P.M.**

**DEBTORS' REQUEST FOR EXPEDITED HEARING ON
MOTION TO AUTHORIZE PAYMENT IN THE ORDINARY COURSE OF
BUSINESS OF CERTAIN EMPLOYEE BONUSES EARNED PREPETITION**

The above-referenced debtors and debtors in possession (the "Debtors"), by counsel, hereby request (the "Request") that this Court set an expedited hearing for April 29, 2014 at 2:00 p.m. on the Debtors' *Motion to Authorize Payment in the Ordinary Course of Business of Certain Employee Bonuses Earned Prepetition* [Dkt. No. 305] (the "Motion").

¹ The Debtors in these chapter 11 cases are Buffet Partners, L.P. and Buffet G.P., Inc.

CAUSE EXISTS FOR AN EXPEDITED HEARING

1. For the reasons set forth in the Motion, the Debtors seek authorization to pay postpetition in the ordinary course of business, performance bonuses accrued prepetition by certain of its employees.

2. An expedited hearing on the Motion is warranted since this Court has previously authorized the Debtors to pay, postpetition, “Employee Claims” which include bonuses accrued prepetition. *See Order Authorizing Payment of Prepetition Wages, Salaries, Commissions, Reimbursable Employee Expenses and Benefits in the Ordinary Course of Business* [Dkt. No. 37] (the “Wage Order”). The Debtors therefore filed the Motion only in an abundance of caution to ensure that interested parties have an opportunity to raise any concerns they might have with the relief sought in the Motion.

3. An expedited hearing is further warranted since the bonus payments the Debtors seek to make are typically paid in or around the month of April. Any delay in payment past April 2014 could therefore cause concern among the Debtors’ employees as to the continued viability of the company while in bankruptcy and the security of their employment. Such concerns and perceived uncertainty could negatively impact the employees’ performance and ultimately the Debtors’ profits.

CERTIFICATE OF CONFERENCE

4. On April 4, 2014, counsel to the Debtors informed counsel to the Official Committee of Unsecured Creditors (the “UCC”), counsel to Chatham Credit Management III, LLC, and the Office of the United States Trustee for the Northern District of Texas (the “UST”) that the Debtors intend to pay the Dynamic Foods Bonuses as authorized under the Wage Order. Neither Chatham Credit Management III, LLC nor the UCC objected to such payment. The UST, however, suggested on April 14, 2014 that prior to making the payments, the Debtors file

a motion requesting authorization specifically with respect to the Dynamic Foods Bonuses, which motion may contain negative notice language and be set for expedited hearing. Accordingly, this Request is unopposed.

WHEREFORE, the Debtors respectfully request that the Court grant the Request and enter an order setting an expedited hearing on the Motion for April 29, 2014 at 2:00 p.m. and granting the Debtors such other and further relief as the Court deems just and proper.

Dated: April 23, 2014
Dallas, Texas

Respectfully submitted,

BAKER & McKENZIE LLP

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CERTIFICATE OF SERVICE

This is to certify that on April 23, 2014, a copy of the foregoing document was served on the parties registered to receive electronic notification via the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas, and on those parties listed via the methods indicated on the Debtors' Master Service List.

/s/ John E. Mitchell
John E. Mitchell